

09 July 2010

Dear Commissioner Giudice:

These comments regarding the Biomass Sustainability and Carbon Policy Study (Manomet Study) are filed on behalf of Maine Forest Service Director Alec Giffen.

We have had good experience over the years with Manomet and have partnered with the organization's Maine office on issues regarding forest carbon, climate change, and biodiversity. We have always found their work to be of high quality.

We have undertaken a very preliminary review of the Manomet Study and find it helpful in improving our understanding of the complex issues surrounding the uses of forest biomass. While we have not delved into the full details of the report, we think that Manomet's approach seems sound and its conclusions seem reasonable.

However, we urge caution in extrapolating the study's results beyond Massachusetts to other states in the region, particularly to a state like Maine which has a robust, diverse forest products industry cluster; nearly 18 million acres of forest land on which growth exceeds harvest, as evidenced by forest inventory information; and, one of the highest percentages in the nation of forest land certified to a third-party standard.

With the caveats noted above, as the Commonwealth of Massachusetts seeks to use the analysis performed by Manomet to develop policies regarding the use of forest biomass, we suggest that the matter requires a regional analysis that provides a more full accounting of forest carbon dynamics, greenhouse gas emissions, and forest sustainability.

Thank you for the opportunity to comment. As an interested party in this matter, we look forward to participating as appropriate in the policy development phase.

Best regards,

Donald J. Mansius
Director, Forest Policy & Management
Maine Forest Service - Dept. of Conservation